

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Intersections Inc. and Net Enforcers, Inc.,

Plaintiffs,

v.

Joseph C. Loomis and Jenni M. Loomis,

Defendants.

Civil Action No. 1:09CV597 (LMB/TCB)

INTERSECTIONS INC.'S MOTION FOR SANCTIONS

Plaintiff Intersections Inc. (“Intersections”), by counsel, for the reasons stated in the accompanying Memorandum, respectfully moves this Court for entry of an Order (1) dismissing the Counterclaims filed by Defendant Joseph C. Loomis (“Loomis”) against Intersections and Net Enforcers, Inc. (“NEI”) (collectively, “Plaintiffs”), (2) an adverse inference at trial that the documents Loomis and his sister, Defendant Jenni Loomis, have failed to properly produce would have proved the claims filed against them by Plaintiffs in the Complaint, (3) the striking of Defendants’ affirmative defenses, (4) any other sanctions the Court deems appropriate, and (5) award Intersections its attorneys’ fees and costs incurred in bringing this Motion.

Dated: November 24, 2009

Respectfully submitted,

By: _____/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of November, 2009, I will electronically file the foregoing Plaintiff's Motion for Sanctions with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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